



DEPARTMENT OF NATURAL RESOURCES

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MEMORANDUM

DATE: October 28, 2005

TO: Mohamad Alhalabi, Director
St. Louis Regional Office

FROM: James L. Kavanaugh, Interim Director
Air Pollution Control Program

Original Signed by James L. Kavanaugh

SUBJECT: Stage II Vapor Recovery Enforcement Policy- Husky 3360 Breakaway Identification

This memorandum addresses the problem with the identification of Husky Model 3360 breakaways installed at gasoline dispensing facilities in the St. Louis ozone non-attainment area. It has come to our attention that identification of some of these breakaways by inspectors is nearly impossible. This is due to a change in the labeling technique by Husky Corporation.

Formerly, Husky labeled the model 3360 breakaways with an adhesive label. The adhesive label was determined to be unacceptable by the California Air Resources Board (CARB) due to the ability for the label to be easily removed. Husky recently started using a laser etching technique to label their breakaways. However, the etching is so faint it usually cannot be read or even seen.

This obviously creates a problem for determining compliance with the vapor recovery regulations. In order to resolve this problem inspectors are to use the following policy while attempting to identify the Husky 3360 breakaway. First, the inspector should check to see if there is a readable label or etching on the breakaway. If not, the inspector must then attempt to identify the breakaway by its unique physical characteristics. The Husky 3360 breakaway has three dimples spaced equally (120°) around the body, and a horizontal line approximately 1 1/2 inches from the short hose end (see attached photographs). These physical characteristics are unique to the Husky 3360 breakaway. In order to view these physical characteristics the black vinyl cover must be removed. The inspector can either attempt to slip the cover down far enough to view the physical characteristics, or the inspector can ask a facility representative to remove the cover. The cover may be cut off or removed permanently as it is only for aesthetic purposes and is not needed for the component to be in compliance with the vapor recovery regulations.

If there is no label on the breakaway and the inspector cannot identify it by physical characteristics, the breakaway must be tagged out of service. The facility will then have 15 days to contact Husky Corporation and have one of their representatives come to the facility to certify the component is in fact a Husky 3360 breakaway.



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If after the inspector exhausts the above means of identification and the breakaway is still unidentifiable, the inspector must tag the breakaway out of service (if he/she has not already done so) and issue a notice of violation for use of an unapproved component. If the inspector is able to identify the component as a Husky 3360 breakaway, the inspector should make a note of this on the inspection form for future reference during the following inspection cycles.

Thank you for your assistance in implementing this new policy.

JLK:rsd

Attachment

c: Air Pollution Control Program, Policy Manual
City of St. Louis, Division of Air Pollution Control
St. Louis County Department of Health, Air Pollution Control Section



HUSKY 3360 BREAKAWAY



HUSKY 3360 BREAKAWAY
(Two in forefront)



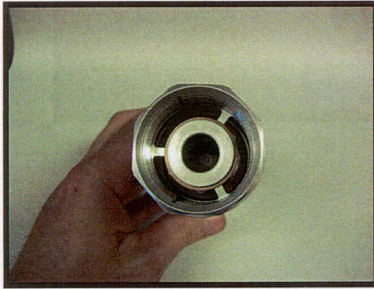
HUSKY 3030 BREAKAWAY
(Unapproved)



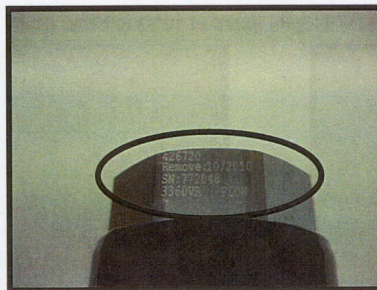
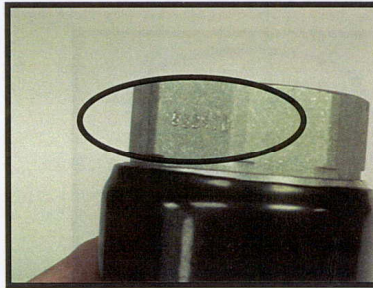
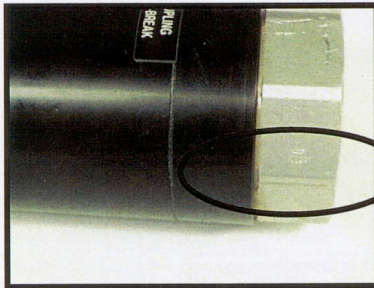
SAFE – T – BREAK IDENTIFICATION

Model No. 3360VR

All the 3360VR's have an end fitting with **8 sides**. (Reference Pictorial)

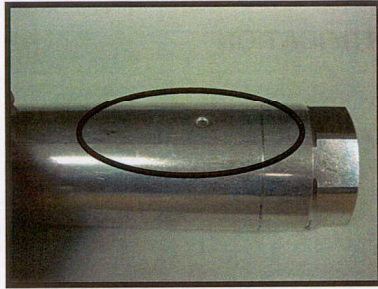


The end fitting is stamped with a **code date** (MM YY or MM T YY), or a **6 digit lot number** (xxxxxx), or a **remove by date**. (Reference Pictorial)

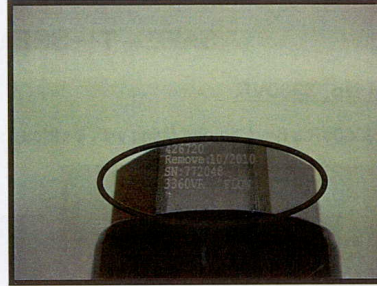


Husky Corporation, Model 3360VR and 3030 Breakaway Identification.

If the code date is older than 12/93 it will be necessary to look for **dimples** in the metal sleeve or at the label under the plastic cover to identify it as a 3360VR. (Reference Pictorial)

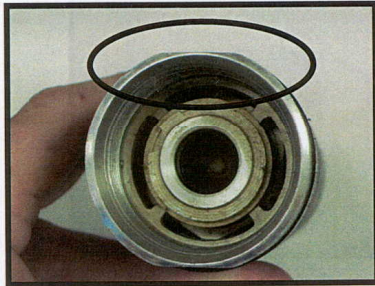


All units with **lot numbers** and the **remove by date** markings are 3360VRs. (Reference Pictorial). All current production is being marked with 3360VR and the **flow direction arrow** on the end fitting. (Reference Pictorial)



Model No. 3030:

All units with less than 8 sides are 3030's. (Reference Pictorial)



The 3030's with **8 sides** were stamped with **code dates of 12/93** or older. (Reference Pictorial)

